

**ORIGINAL****UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Genworth Life Insurance Company of New York Plaintiff,

8 cv 2163 ( )

- against -

Michelle Glassberg Defendant.  
Irrevocable Trust, et al.,**MOTION TO ADMIT COUNSEL****PRO HAC VICE**

MAR 14 2008

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
MAR 14 PM 2:57

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Steven Skulnik a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Timothy J. Robinson  
Firm Name: SQUIRE, SANDERS & DEMPSEY L.L.P.  
Address: 1300 Huntington Center, 41 South High Street  
City/State/Zip: Columbus, Ohio 43215  
Phone Number: (614) 365-2700  
Fax Number: (614) 365-2499

Timothy J. Robinson is a member in good standing of the Bar of the States of Ohio

There are no pending disciplinary proceeding against Timothy J. Robinson in any State or Federal court.

Dated: 3/13/2008

City, State: New York, NY

Respectfully submitted,

Sponsor's  
SDNY Bar SS 7821  
Firm Name: Squire Sanders & Dempsey L.L.P.  
Address: 350 Park Avenue  
City/State/Zip: New York, NY 10022  
Phone Number: 212-872-9800  
Fax Number: 212-872-9815

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GENWORTH LIFE INSURANCE COMPANY  
OF NEW YORK f/k/a AMERICAN  
MAYFLOWER LIFE INSURANCE  
COMPANY OF NEW YORK

Case No. 08-cv-2163 (PAC)

Plaintiff,

v.

**DECLARATION IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

MICHELLE GLASSBERG IRREVOCABLE  
TRUST, et al.,

Defendants.

-----  
Steven Skulnik declares as follows:

1. I am of counsel to the law firm of Squire, Sanders & Dempsey L.L.P and an attorney for Genworth Life Insurance Company Of New York f/k/a American Mayflower Life Insurance Company Of New York, Plaintiff in the above-captioned proceeding. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Timothy J. Robinson as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February 1984. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Robinson is of counsel with the firm of Squire, Sanders & Dempsey L.L.P in Columbus, Ohio.

4. I have found Mr. Robinson to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of Timothy J. Robinson, pro hac vice.

6. I respectfully submit a proposed order granting the admission of Timothy J. Robinson, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Timothy B. Robinson, pro hac vice, to represent Petitioner in the above captioned matter, be granted.

I declare under the penalty of perjury that the foregoing is true and correct and was executed this 13<sup>th</sup> day of March, 2008 at New York, New York.

  
\_\_\_\_\_  
Steven Skulnik (SS 7821)

# The Supreme Court of Ohio

## C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Timothy Jay Robinson

was admitted to the practice of law in Ohio on November 05, 1990; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 3rd day of March, 2008.

SUSAN B. CHRISTOFF

*Director, Attorney Services Division*

  
\_\_\_\_\_  
*Attorney Registration Specialist*

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

Genworth Life Insurance Company Plaintiff,  
 of New York

8 cv 2163 (PAC)

- against -

Michelle Glassberg Irrevocable Defendant.  
 Trust, et al.,

**ORDER FOR ADMISSION  
 PRO HAC VICE  
 ON WRITTEN MOTION**

Upon the motion of Steven Skulnik attorney for Plaintiff  
 and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Timothy J. Robinson  
 Firm Name: SQUIRE, SANDERS & DEMPSEY L.L.P.  
 Address: 1300 Huntington Center, 41 South High Street  
 City/State/Zip: Columbus, Ohio 43215  
 Telephone/Fax: (614) 365-2700  
 Email Address: tjrobinson@ssd.com

is admitted to practice pro hac vice as counsel for Plaintiff in the above  
 captioned case in the United States District Court for the Southern District of New York. All attorneys  
 appearing before this Court are subject to the Local Rules of this Court, including the Rules governing  
 discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall  
 immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice  
 fee to the Clerk of Court.

Dated:  
 City, State:

\_\_\_\_\_  
 United States District/Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GENWORTH LIFE INSURANCE COMPANY  
OF NEW YORK f/k/a AMERICAN  
MAYFLOWER LIFE INSURANCE  
COMPANY OF NEW YORK

Case No.: 08 CV 2163 (PAC)

**AFFIDAVIT OF SERVICE**

Plaintiff,

v.

MICHELLE GLASSBERG IRREVOCABLE  
TRUST, et al.,

Defendants.

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STATE OF NEW YORK        }  
                                      } S.S.:  
COUNTY OF NEW YORK    }

JOSEPH R. PARILLA, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age and resides in Staten Island, NY 10314.

That on the 13<sup>th</sup> day of March 2008, I caused to be served via First Class Mail a true copy of the following the foregoing Motion for Admission *pro hac vice* upon:

ANDREW DAVID GLASSBERG IRREVOCABLE TRUST  
c/o Kenneth I. Glassberg, M.D., Trustee  
1930 Broadway 7C  
New York, NY 10023

LAUREN DANA GLASSBERG IRREVOCABLE TRUST  
c/o Kenneth I. Glassberg, M.D., Trustee  
1930 Broadway 7C  
New York, NY 10023

BRIAN L. COOPER IRREVOCABLE TRUST  
c/o Kenneth I. Glassberg, M.D., Trustee  
1930 Broadway 7C  
New York, NY 10023

LOLA LEIGH COOPER IRREVOCABLE TRUST  
c/o Kenneth I. Glassberg, M.D., Trustee  
1930 Broadway 7C  
New York, NY 10023

CHLOE MARIELLE COOPER IRREVOCABLE TRUST

c/o Kenneth I. Glassberg, M.D., Trustee  
1930 Broadway 7C  
New York, NY 10023

LAWRENCE COOPER GLASSBERG IRREVOCABLE TRUST,

c/o Kenneth I. Glassberg, M.D., Trustee  
1930 Broadway 7C  
New York, NY 10023

DR. KENNETH I. GLASSBERG IRREVOCABLE TRUST,

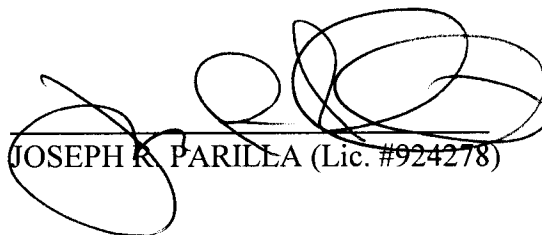
c/o Kenneth I. Glassberg, M.D., Trustee  
1930 Broadway 7C  
New York, NY 10023

KENNETH I. GLASSBERG, M.D.

1930 Broadway 7C  
New York, NY 10023

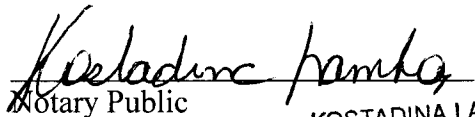
U.S. BANK, N.A., AS SECURITIES INTERMEDIARY

Corporate Trust Services  
EP-MN-WS3D  
60 Livingston Ave.  
St. Paul, MN 55107-2292



JOSEPH R. PARILLA (Lic. #924278)

Sworn to before me this  
13<sup>th</sup> day of March 2008



Notary Public

KOSTADINA LAMBROU  
Notary Public, State of New York  
No. 01LA5041943  
Qualified in Queens County  
Commission Expires April 10, 2011